

REMARKS

Upon entry of this Response, claims 1-131 remain pending in the present application. Claims 3, 7, 12-13, 23-24, 27, 30, 42-43, 46, 49, 61-62, 65, 70, 82-83, 86, 91, 95, 107-708, 111, 114-115, 125-126, and 129 have been amended. Applicants request reconsideration of the pending claims in view of the following remarks.

In item 4 of the Office Action, independent claims 1, 7, 30, 49, 68, 89, 114 and dependent claims 2-6, 8-15, 17-29, 31-32, 36-48, 50-51, 55-67, 69-72, 76-88, 90-97, 101-113, 115-117, 119-131 stand rejected under 35 U.S.C. §103(a) as being unpatentable over "Using 1-2-3 Special Edition" in view of Cobb et al., "Excel in Business." A prima facie case of obviousness is established only when the prior art teaches or suggests all of the elements of the claims. MPEP §2143.03, In re Rijckaert, 9 F.3d 1531, 28 U.S.P.Q2d 1955, 1956 (Fed. Cir. 1993). For the following reasons, Applicants respectfully assert that the cited combination of references fails to show or suggest each of the elements of claims 1-15, 17-32, 36-51, 55-72, 76-97, 101-117, and 119-131. Accordingly, Applicants request that the rejection of these claims be withdrawn.

To begin, **claim 1**, as previously presented, reads as follows:

1. In a computer system having input means for entering data, a plurality of objects to form an object list, and commands into said system by a system user, an operator display module for displaying information to said user, a memory for storing said data and commands, and processing means for performing processing operations in response to the entry of said data and said commands by said user, a method of generating a display on said operator display module comprising the steps in sequence of:

- (a) entering a command into said system by said user to display a form;
- (b) in response to said command, said processing means obtaining said object list, corresponding to said form, from said memory;
- (c) in response to said command, said processing means,

automatically assigning one of a plurality of tiles to each one of said objects, in said object list, in the following manner: at least one of said tiles being assigned to a group of said objects, and at least a second of said tiles being assigned to a single one of said objects; and

(d) said processing means, displaying said tiles on said operator display module.

The Office Action appears to allege that "assigning tiles to objects" corresponds to "Using 1-2-3's step of assigning a cell to the cell information (see page 13)" (Office Action page 3). As such, the Office Action appears to allege that "objects" correspond to "cell information." However, "Using 1-2-3" teaches:

Cells can be filled with three kinds of information: numbers; mathematical formulas, including special spreadsheet functions; and text (or labels). A *cell pointer* allows you to write information into the cells much as a pencil lets you write on a piece of paper.

(Using 1-2-3 Special Edition, page 13). Thus, "Using 1-2-3" discloses a user entering information into a cell, and not "said processing means, automatically assigning one of a plurality of tiles to each one of said objects, in said object list," much less "*in response to said command, said processing means, automatically assigning one of a plurality of tiles to each one of said objects, in said object list*" as recited in claim 1.

The Office Action acknowledges that "Using 1-2-3 does not specifically teach '*in response to said command, said processing means, automatically assigning ...*'" (Office Action, page 3). Rather, the Office Action alleges that "Excel will assign tiles to the imported objects and data accordingly (Excel pages 661-662)" (Office Action, page 3). Although "Excel in Business" teaches "All of the values and labels in the 1-2-3 worksheet will be converted properly into number and text values" (Excel in Business, page 662), the sections of "Excel in Business" cited by the Office Action do not teach assigning the imported number and text values. Thus, "Using 1-2-3" in view of "Excel in

Business" does not disclose "said processing means, automatically assigning one of a plurality of tiles to each one of said objects, in said object list" as recited in claim 1.

Also, neither "Using 1-2-3" nor "Excel in Business" disclose "obtaining an object list" as recited in claim 1. Although the Office Action appears to allege that "obtaining an object list" corresponds to "Using 1-2-3's step of obtaining cell information, e.g. numbers, text and formulas (see p. 13)" (Office Action, page 3), the Office Action also appears to allege, as noted above, that "objects" correspond to "cell information." As such, one skilled in the art would understand that "obtaining cell information" does not correspond to obtaining a list of cell information. Thus, "Using 1-2-3" in view of "Excel in Business" does not teach "in response to said command, said processing means obtaining said object list, corresponding to said form, from said memory," much less "in response to said command, said processing means, automatically assigning one of a plurality of tiles to each one of said objects, in said object list" as recited in claim 1.

In addition, while the Office Action acknowledges that "Using 1-2-3 does not specifically teach assigning a single tile to a group of objects and assigning a single tile to an individual object", it alleges that

it would have been obvious to one of ordinary skill in the art at the time of the invention to have employed such 'assignments', since Using 1-2-3 provides assignments which are at least suggestive of the claimed assignments. For example, Using 1-2-3's assignment of +A1+B1 to cell C1 (see p. 16) is the assignment of A1 (object #1) and B1 (object #2) to single cell ("title") D1.

(Office Action, page 3). However, in the cited section, *Using 1-2-3* teaches about "Formulas":

Electronic spreadsheets allow mathematical relationships to be created between cells. For example, if the cell named C1 contains the formula

+A1+B1

then C1 will display the sum of the contents of the cells A1 and B1.
(The + sign before A1 tells 1-2-3 that this is a formula, not text.)

(Using 1-2-3, page 16). As noted above, the Office Action appears to allege that "objects" correspond to "cell information" which includes "numbers, text and formulas" (Office Action, page 3). Thus, "Using 1-2-3" teaches a cell containing a formula and not "at least one of said tiles being assigned to a group of said objects" as recited in claim 1.

The addition of the "Excel in Business" sections cited by the Office Action do not overcome this deficiency. While "Excel in Business" teaches that "Excel ... will convert the file as it loads it" (Excel in Business, page 662), it does not teach or suggest "at least one of said tiles being assigned to a group of said objects."

Furthermore, neither "Using 1-2-3" nor "Excel in Business" teach or suggest "said processing means, automatically assigning one of a plurality of tiles to each one of said objects, in said object list, in the following manner: at least one of said tiles being assigned to a group of said objects, and at least a second of said tiles being assigned to a single one of said objects" as recited in claim 1. Therefore, "Using 1-2-3" in view of "Excel in Business" does not teach "in response to said command, said processing means, automatically assigning one of a plurality of tiles to each one of said objects, in said object list, in the following manner: at least one of said tiles being assigned to a group of said objects, and at least a second of said tiles being assigned to a single one of said objects" as recited in claim 1.

Accordingly, Applicants assert that "Using 1-2-3" in view of "Excel in Business" fails to show or suggest each of the elements of claim 1. In addition, Applicants assert that "Using 1-2-3" in view of "Excel in Business" fails to show or suggest each of the elements

of claims 2-6, 12-15, and 17-29 as depending from claim 1. Accordingly, Applicants request that the rejection of claims 1 and 2-6, 12-15, and 17-29 be withdrawn.

Additionally, the Office Action puts forward the same allegations with respect to amended **claims 7, 30, 49, and 114** (Office Action, pages 5-7, 10-11, 14-16, and 27-28, respectively) and previously presented **claims 68 and 89** (Office Action, pages 19-20 and 21-22, respectively). For the same reasons described above, "Using 1-2-3" in view of "Excel in Business" does not disclose all of the elements of claims 7, 30, 49, 68, 89, and 114. In addition, Applicants assert that "Using 1-2-3" in view of "Excel in Business" fails to show or suggest each of the elements of claims 8-11, 31-32 and 36-48, 50-51 and 55-67, 69-72 and 76-88, 90-97 and 101-113, 115-117 and 119-131 as depending from claims 7, 30, 49, 68, 89, and 114, respectively. Accordingly, Applicants request that the rejection of claims 7-11, 30-32 and 36-48, 49-51 and 55-67, 68-72 and 76-88, 89-97 and 101-113, 114-117 and 119-131 be withdrawn.

Next, **claim 3** has been amended as follows:

3. The method of claim 1 further comprising the steps, in sequence, between steps (b) and (c), using said processing means, of:
 - (b1) in response to said command, automatically eliminating an object from said object list if said object is not currently monitored by said system;
 - (b2) in response to said command, automatically obtaining a prioritization list from said memory; and
 - (b3) in response to said command, automatically arranging said objects according to said prioritization list.

The Office Action alleges that "Using 1-2-3's step of deleting characters (pp. 66-68), deleting rows and columns of data (pp. 98-101) and deleting files (see pp. 277-278) are equivalent to the claimed steps of 'eliminating an object'" (Office Action, page 4).

However, "Using 1-2-3" teaches:

Remember that when you use the /Worksheet Delete command, the rows or columns you delete are gone forever. This includes all the cells in the rows or columns, not just the range of cells you specify. ...

Once a file has been deleted, that file cannot be recovered by conventional means. ...

(Using 1-2-3, pages 100 and 278, respectively). Thus, "Using 1-2-3" teaches permanent deletion of cells, and the values they contain, and not "eliminating an object from said object list" as recited in claim 3. Applicants assert that permanently deleting cells is not "eliminating an object from said object list."

Also, "Using 1-2-3" does not disclose the computer system monitoring objects, much less "automatically eliminating an object from said object list if said object is not currently monitored by said system." Nor does "Using 1-2-3" teach "in response to said command, automatically eliminating an object from said object list if said object." The addition of the "Excel in Business" sections cited by the Office Action do not overcome these deficiencies. Therefore, "Using 1-2-3" in view of "Excel in Business" does not teach "in response to said command, automatically eliminating an object from said object list if said object is not currently monitored by said system" as recited in amended claim 3.

In addition, while the Office Action acknowledges that "Using 1-2-3 does not specifically teach a 'polarization list'", the Office Action alleges that "it would have been obvious to one of ordinary skill in the art at the time of the invention to provide such a feature, since Using 1-2-3 teaches a menu ('list') which provides different methods of data prioritization (see pp. 274-277)" (Office Action, page 4). However, in the cited section, *Using 1-2-3 teaches about "Combining Files":*

The command used to combine data ... gives you the following menu options:

- | | |
|----------|--|
| Copy | Pulls in an entire worksheet or a named range and causes the new contents to write over the corresponding cells in the existing worksheet. ... |
| Add | Pulls in the values from the entire worksheet to a named range and adds these values to the corresponding cells in the current worksheet. ... |
| Subtract | Pulls in an entire worksheet or a named range and subtracts the values from the corresponding cells in the current worksheet. ... |

(Using 1-2-3, page 275). "Using 1-2-3" does not disclose either "obtaining a prioritization list from said memory" or "arranging said objects according to said prioritization list" as alleged by the Office Action. Nor does "Using 1-2-3" teach or suggest either "said processing means ... in response to said command, automatically obtaining a prioritization list from said memory" or "said processing means ... in response to said command, automatically arranging said objects according to said prioritization list" as recited in amended claim 3.

The addition of the "Excel in Business" sections cited by the Office Action do not overcome these deficiencies. Thus, "Using 1-2-3" in view of "Excel in Business" does not teach or suggest either "in response to said command, automatically obtaining a prioritization list from said memory" or "in response to said command, automatically arranging said objects according to said prioritization list" as recited in amended claim 3.

Accordingly, Applicants assert that "Using 1-2-3" in view of "Excel in Business" fails to show or suggest each of the elements of claim 3. Accordingly, Applicants request that the rejection of claim 3 be withdrawn.

Additionally, the Office Action puts forward the same allegations with respect to amended **claims 7, 49, and 91** (Office Action, pages 6, 15, and 22, respectively). For the same reasons described above, "Using 1-2-3" in view of "Excel in Business" does not

disclose all of the elements of claims 7, 49, and 91. In addition, Applicants assert that "Using 1-2-3" in view of "Excel in Business" fails to show or suggest each of the elements of claims 8-11, 50-51 and 55-67 as depending from claims 7 and 49, respectively. Accordingly, Applicants request that the rejection of claims 7-11, 49-51 and 55-67, and 91 be withdrawn.

Next, **claim 4**, as previously presented, reads as follows:

4. The method of claim 1 wherein in step (c) at least one of said tiles comprises a text region and a data region.

The Office Action alleges that:

if cell C1 contains 'ALPHA + 100', the region of the cell containing the variable name ALPHA is the 'text region', while the region of the cell containing the value 100 is the 'data region'. Therefore, Using 1-2-3 teaches the claimed 'regions'

(Office Action, page 4). Although "Using 1-2-3" teaches "Cells can be filled with three kinds of information: numbers; mathematical formulas, including special spreadsheet functions; and text (or labels)" (Using 1-2-3 Special Edition, page 13), "Using 1-2-3" does not disclose cells filled with different kinds of information, much less cells comprising regions. Thus, Applicants assert that "ALPHA + 100" is a formula and not text as alleged. The addition of the "Excel in Business" sections cited by the Office Action do not overcome this deficiency. Thus, "Using 1-2-3" in view of "Excel in Business" does not teach or suggest "at least one of said tiles comprises a text region and a data region" as recited in claim 4.

Accordingly, Applicants assert that "Using 1-2-3" in view of "Excel in Business" fails to show or suggest each of the elements of claim 4. Accordingly, Applicants request that the rejection of claim 4 be withdrawn.

Additionally, the Office Action puts forward the same allegations with respect to previously presented **claim 92** (Office Action, pages 22-23). In addition, the Office Action alleges that previously presented **claim 9** is rejected "along the same rationale" as claim 4 (Office Action, page 7). For the same reasons described above, "Using 1-2-3" in view of "Excel in Business" does not disclose all of the elements of claims 9 and 92. Accordingly, Applicants request that the rejection of claims 9 and 92 be withdrawn.

Next, **claim 12** has been amended as follows:

12. The method of claim 1 wherein step (d) further comprises the step of, in response to said command, said processing means automatically refraining from displaying on said operator display module at least one of said tiles that is without any of said objects.

The Office Action alleges that:

Using 1-2-3 teaches hiding columns (e.g. cells or 'tiles') in a spreadsheet (see p. 101), providing reasonable suggestion to one of ordinary skill in the art at the time of the invention to refrain from displaying a column (e.g. tile(s) without any objects).

(Office Action, page 7). However, "Using 1-2-3" teaches that the "Column Hide command allows you to suppress the display of any columns" (Using 1-2-3, page 101). "Using 1-2-3" does not teach "in response to said command [to display a form], said processing means automatically refraining from displaying on said operator display module at least one of said tiles that is without any of said objects."

The addition of the "Excel in Business" sections cited by the Office Action do not overcome this deficiency. Accordingly, Applicants assert that "Using 1-2-3" in view of "Excel in Business" fails to show or suggest each of the elements of claim 12. Accordingly, Applicants request that the rejection of claim 12 be withdrawn.

Additionally, the Office Action puts forward the same allegations with respect to amended **claims 30, 49, 95 and 115** (Office Action, pages 11, 15, 24, and 28, respectively). In addition, the Office Action alleges that amended **claim 70** is rejected "along the same rationale" as claim 12 (Office Action, page 21). For the same reasons described above, "Using 1-2-3" in view of "Excel in Business" does not disclose all of the elements of claims 30, 49, 70, 95, and 115. In addition, Applicants assert that "Using 1-2-3" in view of "Excel in Business" fails to show or suggest each of the elements of 31-32 and 36-48, 50-51 and 55-67 as depending from claims 30 and 49, respectively. Accordingly, Applicants request that the rejection of claims 30-32 and 36-48, 49-51 and 55-67, 70, 95 and 115 be withdrawn.

Next, **claim 13** has been amended as follows:

13. The method of claim 1 further comprising the steps of:
 - (e) receiving a manually input object in a cell of a yet another one of said first tiles of the first form from said user;
 - (f) receiving a second command in said system from said user to display a second form having associated second tiles;
 - (g) in response to said second command, obtaining a second object list, corresponding to said second form, from said memory;
 - (h) in response to said second command, said processing means automatically associating said second tiles and said manually input object in said second object list; and
 - (i) in response to said second command, said processing means, displaying those of said second tiles on said operator display module that are associated with said manually input object received from said user, while automatically refraining from displaying those of said second tiles on said operator display module that are not associated with said manually input object.

The Office Action acknowledges that "Using 1-2-3 does not specifically teach a second command to display a second form, the object being associated with the second form, a second object list etc." (Office Action, page 7). The Office Action then alleges:

Excel teaches linking multiple active worksheets by referencing the second worksheet name in a cell formula, both worksheet displayed accordingly (Excel pp. 284-286, Figures 8-28, 8-29). It would have been obvious to one of ordinary skill in the art at the time of the invention to apply Excel to Using 1-2-3, providing Using 1-2-3 the benefit of linking multiple spreadsheet forms, facilitating analysis of a greater range of data."

(Office Action, page 7). However, neither "Using 1-2-3" nor "Excel in Business" teach or suggest "in response to said second command, said processing means ... automatically refraining from displaying those of said second tiles on said operator display module that are not associated with said manually input object" as recited in amended claim 13.

In addition, for the same reasons described above with respect to claim 1, neither "Using 1-2-3" nor "Excel in Business" disclose "obtaining a second object list, corresponding to said second form, from said memory," much less "in response to said second command, obtaining a second object list ..." as recited in amended claim 13. Furthermore, although "Excel in Business" teaches that Excel "first checks to see whether the worksheets to which the dependent formulas refer are open" (Excel in Business, page 288), neither "Using 1-2-3" nor "Excel in Business" disclose "in response to said second command, automatically associating said second tiles and said manually input object in said second object list" as recited in amended claim 13.

Accordingly, Applicants assert that "Using 1-2-3" in view of "Excel in Business" fails to show or suggest each of the elements of claim 13. Accordingly, Applicants request that the rejection of claim 13 be withdrawn.

Additionally, the Office Action puts forward the same allegations with respect to amended **claim 49** (Office Action, page 15). For the same reasons described above, "Using 1-2-3" in view of "Excel in Business" does not disclose all of the elements of claim 49. In addition, Applicants assert that "Using 1-2-3" in view of "Excel in Business" fails to

show or suggest each of the elements of claims 50-51 and 55-67 as depending from claim 49. Accordingly, Applicants request that the rejection of claims 49-51 and 55-67 be withdrawn.

Next, **claim 23** has been amended as follows:

23. The method of claim 1 further comprising the steps of:
receiving data in a first cell of said form; and
in response to receiving said data in said first cell, said processing
means automatically recording an identity of said user that entered said
data.

The Office Action appears to allege that "Using 1-2-3'a password function, which logs a user accordingly (see pp. 22-23)" (Office Action, page 9) corresponds to "recording an identity of said user that entered said data." Although "Using 1-2-3" teaches:

use passwords to protect your worksheets ... you use two commands: the /Worksheet Global Protection command and the /Range Protect command. These commands prevent someone from erasing, moving, or changing the cells even though the cell contents are displayed on the screen

(Using 1-2-3, page 22), "Using 1-2-3" does not disclose "recording an identity of said user that entered said data" as recited in claim 1.

The addition of the "Excel in Business" sections cited by the Office Action do not overcome this deficiency. In addition, neither "Using 1-2-3" nor "Excel in Business" teach or suggest "in response to receiving said data in said first cell, said processing means automatically recording an identity of said user that entered said data" as recited in amended claim 23.

Accordingly, Applicants assert that "Using 1-2-3" in view of "Excel in Business" fails to show or suggest each of the elements of claim 23. Accordingly, Applicants request that the rejection of claim 23 be withdrawn.

Additionally, the Office Action puts forward the same allegations with respect to amended **claims 42, 61, 107, and 125** (Office Action, pages 13,17, 25, and 29-30, respectively). In addition, the Office Action alleges that amended **claim 82** is rejected "along the same rationale" as claim 23 (Office Action, page 9). For the same reasons described above, "Using 1-2-3" in view of "Excel in Business" does not disclose all of the elements of claims 42, 61, 82, 107, and 125. Accordingly, Applicants request that the rejection of claims 42, 61, 82, 107, and 125 be withdrawn.

Next, **claim 24** has been amended as follows:

24. The method of claim 1 further comprising the steps of:
receiving data in a first cell of said form; and
in response to receiving said data in said first cell, said processing
means automatically recording a time when said user entered said data.

The Office Action acknowledges that "Using 1-2-3 does not specifically teach storage of recording a time of entry" (Office Action, page 9). The Office Action then alleges that:

it would have been obvious to one of ordinary skill in the art at the time of the invention to provide such a feature, since Using 1-2-3 teaches date and time functions (see p.18) which permits capture of the current date and time from the system clock."

(Office Action, page 9).

However, "Using 1-2-3" teaches "Cells can be filled with ... mathematical formulas, including special spreadsheet functions" (Using 1-2-3, page 13).

The 1-2-3 date and time functions give you tremendous flexibility for manipulating dates and times in your worksheets. With the basic @NOW function, you can capture the current date and time from your system clock.

(Using 1-2-3, page 18). Thus, "Using 1-2-3" discloses the user entering into a cell a function that captures the current time and not "recording a time when said user entered said data" as recited in claim 24.

The addition of the "Excel in Business" sections cited by the Office Action do not overcome this deficiency. In addition, neither "Using 1-2-3" nor "Excel in Business" teach or suggest "in response to receiving said data in said first cell, said processing means automatically recording a time when said user entered said data" as recited in amended claim 24.

Accordingly, Applicants assert that "Using 1-2-3" in view of "Excel in Business" fails to show or suggest each of the elements of claim 24. Accordingly, Applicants request that the rejection of claim 24 be withdrawn.

Additionally, the Office Action puts forward the same allegations with respect to amended **claims 43, 62, 108, and 126** (Office Action, pages 13, 17, 13, and 29-30, respectively). In addition, the Office Action alleges that amended **claim 83** is rejected "along the same rationale" as claim 24 (Office Action, page 9). For the same reasons described above, "Using 1-2-3" in view of "Excel in Business" does not disclose all of the elements of claims 43, 62, 83, 108, and 126. Accordingly, Applicants request that the rejection of claims 43, 62, 83, 108, and 126 be withdrawn.

Next, **claim 27** has been amended as follows:

27. The method of claim 1 further comprising the steps of:
receiving data in a first cell of said form;
in response to receiving said data in said first cell, said processing
means automatically performing a data integrity check upon said data to
determine if said data is outside a range; and
alerting said user of an error based upon said data integrity check.

While the Office Action acknowledges that "Using 1-2-3 does not specifically teach integrity checks of ranges" (Office Action, page 10), the Office Action alleges:

Excel teaches displaying error values associated with formula errors etc.
(Excel pp. 68-70). It is noted that Excel page 70 (top half) teaches errors
relating to ranges. It would be obvious to one of ordinary skill in the art at

the time of the invention to apply Excel's error checking to Using 1-2-3's error reporting, providing Using 1-2-3 the benefit of range checking, ensuring error-free spreadsheets.

(Office Action, page 10). However, "Excel in Business" discloses:

One of the most common error values is #DIV/0! ... #DIV/0! indicates that you have attempted to divide a number by zero. ...

The #NAME? Error value indicates that you have entered a name in a formula that Excel could not find in the Define Name dialog box listing [or] ... if you leave out a colon in a range reference. ...

The #VALUE! Error value usually means that you have entered a mathematical formula that refers to a text entry. ...

You will see a #REF! Error value if you use the Delete... command to eliminate a range of cells whose references are included in a formula.
...

The last, and least common, error value is #NULL!. This error value will appear if ... two ranges have no common cells ...

(Excel in Business, page 68-70). "Excel in Business" does not teach "performing a data integrity check upon said data to determine if said data is outside a range" as recited in claim 27. Nor do either "Using 1-2-3" or "Excel in Business" disclose or suggest "in response to receiving said data in said first cell, said processing means automatically performing a data integrity check upon said data to determine if said data is outside a range" as recited in amended claim 27.

Accordingly, Applicants assert that "Using 1-2-3" in view of "Excel in Business" fails to show or suggest each of the elements of claim 27. Accordingly, Applicants request that the rejection of claim 27 be withdrawn.

Additionally, the Office Action puts forward the same allegations with respect to amended **claims 46, 65, 111, and 129** (Office Action, pages 14,18, 26, and 30, respectively). In addition, the Office Action alleges that amended **claim 86** is rejected

"along the same rationale" as claim 24 (Office Action, page 10). For the same reasons described above, "Using 1-2-3" in view of "Excel in Business" does not disclose all of the elements of claims 46, 65, 86, 111, and 129. Accordingly, Applicants request that the rejection of claims 46, 65, 86, 111, and 129 be withdrawn.

Next, claim 68, as previously presented, reads as follows:

68. In a computer system having (a) input means for enabling entry of data and commands into said system by a system user, said data including a plurality of objects to form an object list, (b) an operator display module for displaying information to said user, (c) a memory for storing said data and commands, and (d) processing means for performing processing operations in response to said entry of said data and said commands by said user, a method of generating a display on said operator display module, comprising the steps in sequence of:

- (1) receiving a command in said system from said user to display a form;
- (2) in response to said command, said processing means obtaining said object list, corresponding to said form, from said memory;
- (3) in response to said command, the processing means, automatically associating each one of said objects in said object list with one of a plurality of tiles in the following manner:
 - (i) a group of objects comprising some but not all of said objects in said object list is associated with a first tile; and
 - (ii) an object in said object list that is not a part of said group of objects is associated with a second tile; and
- (4) the processing means, displaying said tiles on said operator display module.

As discussed previously, the Office Action presents the same allegations against claim 68 (Office Action, pages 19-20) as put forward with respect to claim 1 (Office Action, pages 2-3). For the same reasons described above with respect to claim 1, "Using 1-2-3" in view of "Excel in Business" does not disclose all of the elements of amended claim 68.

In addition, the Office Action acknowledges that "Using 1-2-3 does not specifically teach an object that is not part of said group of objects is associated with a second tile" (Office Action, page 19). The Office Action then alleges:

Excel teaches linking multiple active worksheets by referencing the second worksheet name in a cell formula, both worksheet displayed accordingly (Excel pp. 284-286, Figures 8-28, 8-29). It is noted that Excel p.285 teaches 'LinkTest2!', which can be fairly interpreted as an object in an object list, but not part of a first group of objects. LinkTest! is associated in another cell (tile) and references data objects etc. from another spreadsheet accordingly. It would have been obvious to one of ordinary skill in the art at the time of the invention to apply Excel to Using 1-2-3, providing Using 1-2-3 the benefit of linking multiple spreadsheet forms, facilitating analysis of a greater range of data.

(Office Action, pages 19-20). Applicants respectfully disagree.

The Office action alleges that "LinkTest2!" ... can be fairly interpreted as an object in an object list," however, the Office Action also appears to allege that "objects" correspond to "cell information" which includes "numbers, text and formulas" (Office Action, page 3). Regarding "LinkTest2!," "Excel in Business" teaches:

Creating a formula that links two spreadsheets. ... must include the name of the remote worksheet, followed by an exclamation mark, in a dependent formula that links the two worksheets. ...

Suppose you want to link cell A1 in the worksheet named LinkTest1 to cell A10 in the worksheet named LinkTest2. To do this, you click cell A1 in LinkTest1 and enter the dependent formula

`=LinkTest2!A10`

(Excel in Business, pages 284-285). As such, "LinkTest2!" is part of the formula and not "an object" as alleged. Furthermore, "Excel in Business" does not teach or suggest that "LinkTest2!" is part of a list, much less a list that is divided into a group that does not include "LinkTest2!." Thus, "Excel in Business" does not disclose "associating each one of said objects in said object list with one of a plurality of tiles in the following manner: (i) a group of objects comprising some but not all of said objects in said object list is associated with a first tile; and (ii) an object in said object list that is not a part of said group of objects is associated with a second tile" as recited in claim 68.

In addition, neither "Using 1-2-3" nor "Excel in Business" teach or suggest "in response to said command, the processing means, automatically associating each one of said objects in said object list with one of a plurality of tiles in the following manner: (i) a group of objects comprising some but not all of said objects in said object list is associated with a first tile; and (ii) an object in said object list that is not a part of said group of objects is associated with a second tile" as recited in amended claim 68.

Accordingly, Applicants assert that "Using 1-2-3" in view of "Excel in Business" fails to show or suggest each of the elements of claim 68. In addition, Applicants assert that "Using 1-2-3" in view of "Excel in Business" fails to show or suggest each of the elements of claims 69-72 and 76-88 as depending from claim 68. Accordingly, Applicants request that the rejection of claims 68 and 69-72 and 76-88 be withdrawn.

In item 5 of the Office Action, dependent claims 16, 33-35, 52-54, 73-75, 98-100, and 118 stand rejected under 35 U.S.C. §103(a) as being unpatentable over "Using 1-2-3 Special Edition" in view of Cobb et al., "Excel in Business" and in further view of McDonald et al., "The Benefits of Automated Medical Record Systems for Ambulatory Care." Claims 16, 33-35, 52-54, 73-75, 98-100, and 118 depend from independent claims 1, 30, 49, 68, 89, and 114, respectively. Accordingly, Applicants request that the rejection of claims 16, 33-35, 52-54, 73-75, 98-100, and 118 be withdrawn as depending from claims 1, 30, 49, 68, 89, and 114 for the same reasons described above with respect to claims 1, 30, 49, 68, 89, and 114.

CONCLUSION

It is requested that all outstanding objections and rejections be withdrawn and that this application and all presently pending claims be allowed to issue. If the Examiner has any questions or comments regarding this Response, the Examiner is encouraged to telephone the undersigned counsel of Applicants.

Respectfully submitted,

/Michael J. D'Aurelio/

Michael J. D'Aurelio
Registration Number: 40,977

Thomas, Kayden, Horstemeyer & Risley, L.L.P.

600 Galleria Parkway, S.E.
Suite 1500
Atlanta, Georgia 30339-5948
Phone: (770) 933-9500
Fax: (770) 951-0933